

# **EXHIBIT**

**6**

THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Civil Action No. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR ADMISSIONS, )  
INC., )

Plaintiff, )

v. )

UNIVERSITY OF NORTH CAROLINA, )  
et al., )

Defendants, )

and )

LUIS ACOSTA; CHRISTOPHER )  
JACKSON on behalf of C.J.; RAMONIA )  
JONES on behalf of R.J.; JULIA NIEVES on )  
behalf of I.N.; ANGIE & KEVIN MILLS on )  
behalf of Q.M.; LAURA ORNELAS; )  
CECILIA POLANCO; TAMIKA )  
WILLIAMS on behalf of A.J.; and STAR )  
WINGATE-BEY )

Defendant-Intervenors. )

**DECLARATION OF**  
**HANNA WATSON**

Hanna E. Watson, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Hanna E. Watson. I am over 18 years of age, and I am fully competent to make this declaration.
2. I am a full-time undergraduate student at UNC-Chapel Hill. I am in my 1<sup>st</sup> year and am pursuing a major in Political Science/African, African-American Diaspora Studies.
3. I am African-American.

4. I chose to attend the University of North Carolina first because of its outstanding reputation in my fields of academic interest and second because I was offered a spot in the Robertson Scholars Leadership Program, a full tuition comprehensive scholarship in conjunction with Duke University. I come from an extremely homogeneous white town called Andover, Kansas and I intentionally left the state of Kansas in search of a more diverse experience. I knew that UNC's racial demographics were not a direct reflection of the state of North Carolina but I was excited to learn with hundreds more black people than I had ever been around. The homogeneous nature of my secondary schooling prevented me from the benefits of more diverse options about a wide range of subjects.

5. In September of 2016, shortly after Keith Lamont Scott was killed by police officers, the Carolina community rallied together in protest. I distinctly remember seeing diverse faces taking part in the sit in protests and other demonstrations. Still, most people who care enough to participate were black and I am confident that without a strong black community, the newsworthy protests would not have taken off. Situations of police brutality bring about a collective grief that I do not think I would have been able to bear if I only saw white students around me. The administration's attempts at inclusion while helpful and noticed are not sufficient for creating a comfortable atmosphere in the pursuit of racial injustice.

6. In my POLI 100 class, Intro to American Government, we discussed a few issues involving American ideals, the foundations of the nation, and how certain laws impact different groups today. In my 300 student lecture there were around 30 students of color, maximum, and almost every time the issue of race came up, the class physically looked to one of us for answers. The problem was even more evident in my recitation of the same course in which I was one of two students of color in the 20 person class. Especially in discussions about the presidential

election of 2016, the class often glossed over my opinions as the rantings of an angry black woman who, 150 years later, had not gotten over slavery. I was often uncomfortable in that class, and I feel that my uncomfortability could have been eased by the presence of more diverse perspectives.

7. I am a member of Cadence All-Female A Cappella, and quite often, I feel as if I am the token black person in the a cappella community. Students of color typically follow the unspoken rule to be a part of either the all-black or all-south Asian a cappella groups. While it's important that these two communities are represented in the space, it's problematic that such surprise and taboo surrounds being a part of any of the majority white groups. I also found it interesting that even my introduction to Africa course is majority white. In that setting my opinions are still sometimes seen as the ranting of an angry black woman rather than a complete person with many emotions, thoughts and motivations for holding in disdain many of the systems discussed in that class, such as colonialism.

8. I feel that the UNC Administration generally sweeps racial issues under the rug. In particular, there was little action taken by the UNC administration in light of the Fall 2016 protests on campus. When two black marching band members refused to play the national anthem at football games, following suit of Colin Kaepernick and the hundreds of students who chose not to stand, the Administration requested that the two not come on the field, rather than honoring their protest. During this time of unrest, the university officials did a decent job of allowing open forums for grief to take place but there was little action taken other than allowing black students to congregate as long as they facilitated the meetings themselves. In general, the black community at UNC seems largely separated from the white community. Although we share common spaces and generally get along. There is a lot of de facto segregation outside of

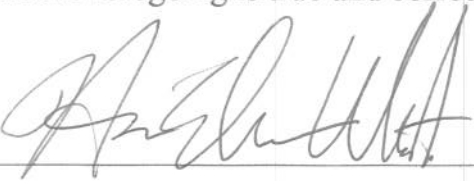
the classroom. In mixed spaces I and other students of color often suffer from acts of microaggression. At UNC-CH, white students don't have to understand the struggles of the minority experience, while minority students constantly have to assimilate, at least to some degree.

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I declare under penalty of perjury that the foregoing is true and correct. Executed  
this 4<sup>th</sup> day of May, 2017.

A handwritten signature in black ink, appearing to read 'Hanna Watson', is written over a horizontal line.

Hanna Watson